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Attorneys for Defendant TMIF II Portola, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA
11 ex rel. PEGGY THORNTON, Relator,
12 and
13 PEGGY THORNTON,
14 Plaintiffs.

16 PORTOLA DEL SOL OPERATOR, LLC, a
17 foreign limited-liability company; TMIF II
18 PORTOLA, LLC, a foreign limited-liability
19 company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company, and RENE RICHARDSON,
as AGENT of PORTOLA DEL SOL
OPERATOR, LLC,

Defendants.

Case No.: 2:21-cv-01123-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR TMIF II
PORTOLA, LLC TO FILE REPLY IN
SUPPORT OF MOTION TO DISMISS
FIRST AMENDED COMPLAINT**

[First Request]

Under Local Rules IA 6-1 and 7-1, Defendant TMIF II Portola, LLC (“TMIF”) and Plaintiff Peggy Thornton (“Thornton”), by and through their attorneys, hereby agree, stipulate, and respectfully request that the Court extend the deadline for TMIF to file the Reply in Support of its Motion to Dismiss First Amended Complaint (“Reply”) from February 23, 2024, up to and including March 8, 2024.

27 || In support of this Stipulation, the parties state as follows:

²⁸ 1. TMIF filed its Motion to Dismiss on January 19, 2024. ECF No. 81.

1 2. Thornton filed her opposition on February 16, 2024. ECF No. 88.
 2 3. TMIF's reply in support of its motion to dismiss is currently due on February 23,
 3 2024.

4 4. Because counsel for TMIF has pre-existing scheduling conflicts both professionally
 5 and personally, TMIF requested Thornton agree to provide a two-week extension until March 8,
 6 2024.

7 5. Thornton has agreed to the requested extension and the requested extension will not
 8 impact any other deadline in this case.

9 6. This is the first request to extend the deadline for TMIF to file its reply in support of
 10 its motion to dismiss.

11 7. This request for an extension of time is not intended to cause any undue delay or
 12 prejudice to any party.

13 8. Therefore, the Parties hereby stipulate that the deadline for TMIF to file its reply in
 14 support of its motion to dismiss shall be extended through March 8, 2024.

15 DATED this 22nd day of February 2024.

16 NEVADA LEGAL SERVICES, INC.

McDONALD CARANO LLP

18 By: /s/ Peter C. Wetherall

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By: /s/ Rory T. Kay

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23 *Attorneys for Defendant TMIF II Portola, LLC*

24 IT IS SO ORDERED.



25
 26 UNITED STATES DISTRICT JUDGE
 27
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DATED: February 23, 2024